

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

MONICA DANIEL HUTCHISON,

Plaintiff,

v.

TEXAS COUNTY, MISSOURI,
MICHAEL R. ANDERSON,
TEXAS COUNTY PROSECUTING
ATTORNEY, and
MICHAEL R. ANDERSON, individually,

Defendants.

Case No.: 09-3018-CV-S-RED

**DEFENDANT ANDERSON'S AMENDED MOTION FOR PROTECTIVE ORDER OR IN
THE ALTERNATIVE MOTION TO QUASH SUBPOENA SERVED UPON DR.
ELIZABETH PRIBOR**

COMES NOW Defendant Michael R. Anderson (hereinafter "Defendant Anderson"),
by and through counsel, and for his Motion for Protective Order or in the Alternative Motion
to Quash Subpoena Served upon Dr. Elizabeth Pribor, states as follows:

1. Dr. Elizabeth Pribor has been retained by defendant Anderson as an expert
in this case.

2. Defendant Anderson has complied with the requirements of Rule 26(a)(2)
regarding the disclosure of Dr. Pribor's report.

3. On or about July 14, 2010, counsel for the plaintiff served Dr. Elizabeth Pribor
with a subpoena commanding the production of the following:

All documents reflecting the percentage of her income that Dr. Pribor derives from
providing expert witness services, as well as documents containing financial information
relating to expert services performed by Dr. Pribor on behalf of defendant's counsel and

other cases from defense counsel retained by State Farm Insurance Company from January 1, 2006 through July 14, 2010.

4. The documents set forth in the subpoena are beyond the scope provided in Rule 26(a)(2) and Rule 35. Furthermore, the request in the subpoena is overbroad and will cause undue burden upon Dr. Pribor.

WHEREFORE, Defendant Anderson prays that this Court enter a protective order preventing the disclosure of the above-requested information or, in the alternative, to quash that portion of the plaintiff's subpoena requesting the production of documents and for such other and further relief as the Court deems just under the circumstances.

**TAYLOR, STAFFORD, CLITHERO,
FITZGERALD & HARRIS, LLP**

By _____
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**COUNSEL FOR DEFENDANT
ANDERSON**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of July, 2010, the foregoing ***Defendant Anderson's Amended Motion for Protective Order or in the Alternative Motion to Quash Subpoena Served upon Dr. Elizabeth Pribor*** was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel for Plaintiff, David L. Steelman and Corey L. Franklin.

/s/ Warren E. Harris

Warren E. Harris